

ORIGINAL

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D C 20554

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Federal Communications Commission  
Office of Secretary

In the Matter Of:

Amendment of Section 73.202(b)  
Table of Allotments  
FM Broadcasting Stations  
(Pauls Valley, Oklahoma)

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MM Docket Number 97-84  
RM-9021

TO: Chief, Allocations Branch

COMMENTS AND COUNTERPROPOSAL

Carter County Broadcasting, ("Carter County") pursuant to Sections 1.401 and 1.420 of the Commission's Rules, hereby submits comments and a counterproposal in the matter of a proposed rulemaking proceeding to allot FM Channel 291A to Pauls Valley, Oklahoma. Carter County requests that the Commission deny the petition to allot Channel 291A to Pauls Valley, and instead, amend the Table of Allotments to add Channel 291A to Ratliff City, Oklahoma. In support of this counterproposal, Carter County offers the following information:

- 1.) The Commission has before it a petition by Mr. Tom Stamper ("Stamper") to allot Channel 291A to Pauls Valley, Oklahoma and has requested comments and counterproposals be submitted by April 21, 1997.
- 2.) Pauls Valley is already served by two local aural transmission services, KGOK-FM, and KVLH-AM, licensed to that community. Additionally, that community receives aural service from several FM services licensed to nearby communities (Note 1). In contrast, Ratliff City, Oklahoma has no local aural service.

(Note 1. KGOK-FM is a Class C3 FM Station and KVLH-AM is a 1000W Day/63W night AM station. Both are licensed to Pauls Valley. In addition, Pauls Valley receives signals from numerous FM station in Oklahoma City, plus a Class C FM station licensed to Ada, Oklahoma.)

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3.) Channel 291A can be allotted to Ratliff City consistent with all of the Commission's Rules, provided that a site restriction of 14.08Km North is required (Note 2). An FM Spacing Study and Distance to Contour Study are attached to this counterproposal, demonstrating compliance with Section 73.207 and Section 73.315 respectively, of the Commission's Rules (Note 3)

4 ) Carter County's counterproposal and Stamper's Petition for Allotment of Channel 291A at Pauls Valley are mutually exclusive.

5 ) The Commission's FM allotment priorities state that preference in allotments will be given based on.

- (1) First Aural Service
- (2) Second Aural Service
- (3) First Local Service
- (4) Other Public Interest Matters

Both Pauls Valley and Ratliff City receive more than two aural services, so priority number three of first local service is the determining factor in weighing the public interest benefits of this allotment.

(Note 2. The reference coordinates of Ratliff City are 34-27-01North/ 97-30-44West. Channel 291A may be allotted to this community by imposing a site restriction of 14.08 KM North, to avoid a short spaced condition to KHKs-FM, licensed to Denton, Texas.)

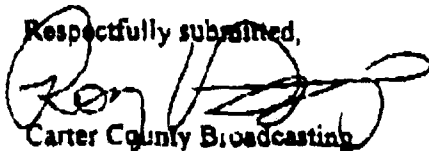
(Note 3. The Contour Study attached specifies operation from coordinates 34-34-38North 97-30-50 West. This site is 14.08Km North of the reference coordinates of Ratliff, Oklahoma, and the Contour Study demonstrates a City Grade Signal (70dbu) of 17.3Km in the direction of Ratliff.)

6.) Finally, in addition to the clear preference of allocating a first local aural service to an underserved community, Carter County offers the following additional factors it wishes the Commission to consider:

Ratliff City, Oklahoma is an incorporated community, with a population of approximately 150, according to the town Clerk. The community has a local government with a Mayor and Board of Trustees. The town also has it's own Post office, and a local city park system. The area surrounding Ratliff City is rural, with abundant recreational facilities, and attracts both local and out-of-state tourists.

In view of the above factors, Carter County Broadcasting hereby respectfully requests that the Commission reject the Petition for Rulemaking to Allot Channel 291A to Paula Valley, in favor of Carter County's counterproposal to allot that Channel to Ratliff City, Oklahoma. If the Channel is allotted to Ratliff City, Oklahoma, as requested, Carter County intends to file an application for authority to construct and operate the station.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Roy Floyd", is written over the typed name and title.

Carter County Broadcasting

Roy Floyd, President

CERTIFICATE OF SERVICE


I hereby state that I have caused to be sent, by registered, first class mail, a copy of the above referenced COMMENTS AND COUNTERPROPOSAL, to the following persons:

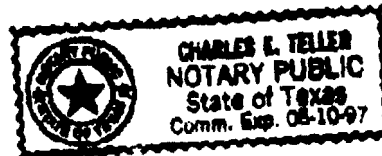
Mr. Tom Stamper  
2402 C Avenue  
Lawton, Oklahoma 73505

Signed.

  
\_\_\_\_\_  
Roy Floyd, President  
Carter County Broadcasting

SIGNED AND SWORN BEFORE ME ON THIS 21 DAY OF APRIL,

1997  
  
\_\_\_\_\_  
Notary



My Commission expires on 5/10/97

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## FM CHANNEL SPACING STUDY

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Job title: Ratliff City Class A

Latitude: N 34 34 38.00

Channel: 291A

Longitude: W 97 30 50.00

Database file name: c:\Emar30\fm970414.edx

Pre-1989 Class A spacings?: N  
Reqd.

CH	Call	Record	City	ST	Status	Bear.	Dist.	Dist.	Result
91C2	KKBI	14225	Broken Bow	OK	LIC	97.6	253.8	166.0	
91C	KQLL	14851	Owasso	OK	LIC	37.3	274.3	226.0	
91C	KHKS	15259	Denton	TX	LIC	167.0	226.2	226.0	.2
91C	KHKS	15261	Denton	TX	LIC	167.1	226.1	226.0	.1
88C2	ALLOTM	15338	Coalgate	OK	VACANT	91.4	132.4	55.0	
88C2	NEW	15339	Coalgate	OK	APP	92.2	135.8	55.0	
89C3	KCMA	15340	Holdenville	OK	CP	71.5	109.6	42.0	
89C3	KCMA	15341	Holdenville	OK	APP	67.3	98.2	42.0	
890A	KIRC	15364	Seminole	OK	LIC	40.2	106.7	72.0	
893A	KCMA	15366	Holdenville	OK	LIC	62.4	116.6	31.0	
889C	KRNB	15942	Decatur	TX	CP MOD	182.1	132.1	95.0	
893A	KXGM	15944	Muenster	TX	LIC	170.2	105.2	31.0	
291A		15975	Pauls Valley	OK	ADD	73.5	30.2	115.0	-84.8
294A	KYNZ	15978	Lone Grove	OK	LIC	147.1	45.1	31.0	
288A	KXXX	16030	Chickasha	OK	LIC	321.7	61.4	31.0	
289A	KROU	16031	Spencer	OK	LIC	1.4	112.3	31.0	
292A	KGOU	16033	Norman	OK	LIC	10.1	80.3	72.0	8.3
292A	KTLT	16517	Wichita Falls	TX	LIC	232.0	123.6	72.0	
292C2	ALLOTM	16518	Wichita Falls	TX	VACANT	232.0	123.6	106.0	
237C3	KMGZ	16537	Lawton	OK	CP	270.2	88.2	12.0	
237A	KMGZ	16538	Lawton	OK	CP	270.2	88.2	10.0	
293A		16570	El Reno	OK	ADD	334.0	118.9	31.0	
290C	KQTZ	16950	Hobart	OK	LIC	281.9	166.2	165.0	1.2

\*\*\*\*\* End of channel 291 study \*\*\*\*\*

DX contour file .000 359.000 45.000 -1.000 415.30 7 1 none  
 DISTANCES TO CONTOURS (Kilometers):

frequency: 106.1000 MHz  
 coordinates: N 34 34 38.00 W 97 30 49.37  
 (50,50) Curves Number of Contours: 5 1

AZ	HAAT	ERPd	CONTOUR LEVELS (dBu):				
(deg)	(m)	(kW)	80.0	70.0	60.0	40.0	40.0
.0	79	5.9979	8.1	14.4	25.7	63.2	63.2
45.0	99	5.9979	9.1	16.0	28.3	67.5	67.5
90.0	114	5.9979	9.8	17.3	30.2	70.6	70.6
135.0	124	5.9979	10.2	18.1	31.3	72.2	72.2
180.0	114	5.9979	9.7	17.3	30.1	70.5	70.5
225.0	109	5.9979	9.5	16.9	29.5	69.5	69.5
270.0	83	5.9979	8.2	14.7	26.2	64.0	64.0
315.0	79	5.9979	8.1	14.4	25.6	63.1	63.1